

PL Sum. J.

Ex. 043



Transcript of **Vincent Vittatoe**

Tuesday, May 3, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115457

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 WK, EH, MM, RP, MB, DP,)
5 AF, CA, RK, KP, TH,)
6)
7 Plaintiffs,)
8) CIVIL ACTION FILE
9 VS.) NO.: 1:20-CV-05263-MHC
10)
11)
12 RED ROOF INNS, et al.,)
13)
14 Defendants,)
15)
16 AND)
17)
18 JANE DOES 1-4)
19)
20 Plaintiffs,)
21) CIVIL ACTION FILE
22 VS.) NO.: 1:21-CV-04278-WMR
23)
24 RED ROOF INNS, INC., et)
25 al.,)
26)
27 Defendants.)

15

16 ORAL AND VIDEOTAPED DEPOSITION OF
17 VINCENT VITTATOE
18 MAY 3, 2022
19

20 ORAL AND VIDEOTAPED DEPOSITION OF VINCENT VITTATOE,
21 produced as a witness at the instance of the PLAINTIFF,
22 and duly sworn, was taken in the above-styled and
23 numbered cause on the 3rd of May, 2022 from 9:12 a.m. to
24 2:49 p.m., before STEFANIE ANDREWS, CSR in and for the
25 State of Texas, reported by machine shorthand, at the
 law offices of Lewis, Brisbois, Bisgaard & Smith, LLP,
 2100 Ross Avenue, Suite 2000, Dallas, Texas 75202.

1 A P P E A R A N C E S

2 FOR THE PLAINTIFFS:

3 Mr. Manoj S. "Sachin" Varghese
4 Ms. Amanda Kay Seals
BONDURANT MIXSON & ELMORE, LLP
1201 West Peachtree Street NW, Suite 3900
5 Atlanta, Georgia 30309
Phone: (404) 881-4174
6 E-mail: Varghese@bmelaw.com
E-mail: Seals@bmelaw.com

7

8 FOR THE PLAINTIFF JA:

9 Mr. Jonathan S. Tonge (Via Zoom)
ANDERSEN TATE & CARR, P.C.
10 1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
11 E-mail: Jtonge@atclawfirm.com

12 FOR THE DEFENDANT RED ROOF INNS:

13 Mr. Adi Allushi
LEWIS BRISBOIS BISGAARD & SMITH
14 600 Peachtree Street, NE, Suite 4700
Atlanta, Georgia 30308
15 E-mail: Adi.allushi@lewisbrisbois.com

16 Mr. Christian Novay
LEWIS BRISBOIS BISGAARD & SMITH
17 550 West Adams Street, Suite 300
Chicago, Illinois 60661
18 E-mail: Christian.novay@lewisbrisbois.com

19 FOR THE DEFENDANT SAI NATIONAL HOSPITALITY VENTURES,
LLC:

20 Mr. C. Shane Keith
HAWKINS PARSELL & YOUNG, LLP
303 Peachtree Street, NE, Suite 4000
22 Atlanta, Georgia 30308
Phone: (404) 614-7464
23 E-mail: Skeith@hpylaw.com

24 ALSO PRESENT:

Colin Coughenour, Videographer
Beth Richardson, Juliana Mesa

1 A. I wasn't aware, but you can find out that
2 there were incidents that had occurred at the
3 properties, yes.

4 Q. You testified previously that Accor North
5 America was the corporate owner of Motel 6, correct?

6 A. At the time, yes.

7 Q. And while you were the security -- the
8 director of security and safety Accor also owned Red
9 Roof Inns, correct?

10 MR. ALLUSHI: Objection.

11 A. At which point in time? They came in at a
12 certain point in time.

13 Q. Sure. Accor acquired Red Roof Inns in 1999,
14 correct?

15 A. Yes, I believe that's correct. Yes, sir.

16 Q. And you joined -- or you became the director
17 in 1998, correct?

18 A. Yes. No. 1999.

19 Q. Thank you.

20 So pretty close in time?

21 A. Yes.

22 Q. When you became the director, Accor also owned
23 Red Roof Inns?

24 COURT REPORTER: I'm sorry. What was the
25 answer?

1 should be observing and reporting as well, correct?

2 A. You -- yes, you would think that he would.

3 Q. And then if you'll turn to page 10, item (p)
4 says [REDACTED]

5 [REDACTED] ?

6 A. Yes, sir.

7 Q. [REDACTED]
8 [REDACTED] ?

9 A. Yes, sir.

10 Q. What steps did you take to ensure that a
11 security contractor was upholding its obligations in a
12 services agreement with Red Roof?

13 A. A lot of the time it was based on conversation
14 with the property in regards to how the security was
15 working out, RDO conversation, or the dialogue with
16 security guard company, and again, if I go to a property
17 and look at the incident reports and see that they don't
18 meet my expectations, then I would have conversation
19 with the security guard companies.

20 Q. Is it fair to say that to identify issues with
21 security services being provided to Red Roof, Red Roof
22 employees at the location would have to bring that to
23 your attention?

24 A. Repeat the question. I'm sorry.

25 Q. Sure. Would it -- would it be fair to say

1 me.

2 Q. Let me rephrase. Exhibit 196 is a
3 November 29th, 2010, e-mail, correct?

4 A. November 29th, 2010, yes.

5 Q. And attached to that e-mail is a safety and
6 security presentation you prepared, correct?

7 MR. ALLUSHI: Objection to form.

8 A. It's a presentation that has my name on it.
9 Again, I've seen differences in this document, so I
10 cannot say that this is the same presentation I put
11 together.

12 Q. Did you alter your presentation in any way
13 during the three-year period you worked for Red Roof?

14 MR. ALLUSHI: Objection.

15 A. I don't remember.

16 Q. You don't remember making changes?

17 A. I don't remember -- I don't remember, but I
18 just know as I look through this document here that you
19 just gave me, there's some differences.

20 Q. When did you stop working for Red Roof Inns?

21 A. November 19th, before Thanksgiving that year,
22 so I want to say it was the 19th of November.

23 Q. Okay. When you stopped working for Red Roof
24 Inns, who assumed your position?

25 A. I don't know that. I wasn't there.

Page 156

1 STATE OF TEXAS)

2 I, STEFANIE ANDREWS, Certified Shorthand Reporter
3 in and for the State of Texas, hereby certify to the
4 following:

5 That the witness, VINCENT VITTATOE, was duly sworn
6 by the officer and that the transcript of the oral
7 deposition is a true record of the testimony given by
8 the witness;

9 That the time used by counsel for the parties is as
10 follows:

11 Mr. Manoj S. Varghese - 04 Hours:09 Minutes
12 Mr. Adi Allushi - 00 Hours:06 Minutes
13 Mr. C. Shane Keith - 00 Hours:00 Minutes
14 Mr. Jonathan S. Tonge - 00 Hours:05 Minutes

15 Further, I am not a relative or employee of any
16 attorney of record in this cause, nor am I financially
17 or otherwise interested in the outcome of the action.

18 CERTIFIED by me on this the 16th day of May, 2022.

19 STEFANIE ANDREWS, Texas CSR 5
20 Expiration Date: 4/30/24



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